



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

**Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Affordable Autobody, LLC**

745 Lemay Ferry Road
St. Louis, Missouri 63125
FRS# N/A

Inspection Date(s)

July 31, 2021
January 25, 2022

SIGNATURE

Scott Postma, Inspector ECAD, Air Branch

Authorized for Release by

SIGNATURE

Tracey Casburn, Air Branch Chief, ECAD

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2. Receipt for Documents, 1 page.
3. Subpart HHHHHH Checklist, 16 pages.
4. Photographs and Photograph Log, 15 pages.
5. Paint Gun Specifications, Jason Fluegge and Tyler Fluegge Training Certifications, Electronic-mails, 6 pages.
6. Spray Booth Filter Material Specification, Electronic-mail, 2 pages.

INSPECTION OBJECTIVE

Due to an odor complaint and EPA's national compliance initiative for Creating Cleaner Air for Communities focused on hazardous air pollutants (HAPs), a full compliance evaluation was conducted to determine compliance at Affordable Autobody, LLC (hereinafter referred to as Affordable or facility) with the Clean Air Act.

Table 1 lists the inspection team members.

Table 1. INSPECTION TEAM MEMBERS	
Name, Title	Affiliation
Scott Postma	EPA, Region 7, ECAD, Air Branch

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 1. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Jason Fluegge, Owner	(314) 285-9520	AffordableAutobodystl@gmail.com
Tyler Fluegge, Employee	Same	Same

FACILITY OVERVIEW

As an area source of HAP's, Affordable is not required to have a Title V permit from the Missouri Department of Natural Resources. Affordable is subject to the following regulations and standards listed in Table 3. Affordable was previously named DN Autobody and was under the different ownership. The name was changed to Affordable at the time of purchase in June 2020.

Affordable has no prior enforcement history.

Table 3 lists the regulations and standards

Table 2. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR, Part 63	Subpart A, General Provisions
40 CFR, Part 63	Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

FACILITY OPERATIONS SUMMARY

Affordable is an automotive body repair and painting facility. Affordable does not do any chemical paint stripping. The facility consists of automotive body repair just outside the front office of the building and paint preparation in the east portion of the building and a painting section in the west portion of the building. Automotive painting is conducted in their self-contained paint booth. The

booth is approximately 25 feet long by 14 feet wide. The paint booth is designed with an outlet filter certified to have a collection efficiency that exceeds the requirements (see Appendix 6). The booth has two fans to maintain the pressure per the requirements in the code of federal regulations at 40 CFR, Part 63, Subpart HHHHHH. Affordable personnel were only repairing vehicles at the time of the inspection.

Establishments involved in paint stripping and automotive painting have a Standard Industrial Classification (SIC) number 7532 and a North American Industrial Classification System (NAICS) number 81121. Affordable typically operates 8-10 hours per day, five days per week and currently employs six people.

FIELD ACTIVITIES SUMMARY

I visited the facility located at 745 Lemay Ferry Road on July 31, 2021. I did not enter the facility because Mr. Jason Fluegge stated that he had COVID-19. I directed Mr. Jason Fluegge to 40 CFR, Part 63, Subpart HHHHHH during my visit. I left shortly after our brief discussion.

On January 25, 2022, I returned to inspect the facility at 745 Lemay Ferry Road. I conducted a drive-by, visual observation of the Affordable facility with no findings. After taking photographs of the exterior of the building, I arrived at the Affordable facility's front entrance at approximately 8:15 a.m. I entered the facility and was greeted by Mr. Jason Fluegge. Mr. Jason Fluegge escorted me to his office. I presented my credentials to Mr. Jason Fluegge and explained the statutory authority and purpose of the inspection. I informed Mr. Jason Fluegge that a Confidentiality Notice would be provided for him to make a confidential business information claim if necessary (Appendix 1). Mr. Jason Fluegge was provided a Confidentiality Notice and Receipt for Documents and Samples form (Appendix 2). After some initial general discussion of the processes used at Affordable and the facility layout, we reviewed the 40 CFR, Part 63, Subpart HHHHHH requirements. No painting was occurring at the time of the inspection.

Mr. Jason Fluegge provided a facility tour for me. During our tour and our discussions, I completed my Subpart HHHHHH checklist (Appendix 3). I took pictures during the facility tour (see Appendix 4). All photographs were taken on January 25, 2022. Mr. Jason Fluegge showed me the repair area and the paint booth.

I requested the paint usage and solvent disposal record, safety data sheets (SDS), painter certification, paint booth specification, paint gun specifications, and filter material specifications. The paint gun certification was provided on site during the inspection and training certifications were provided by Mr. Jason Fluegge via electronic mail on February 18, 2022; these records are available in Appendix 5. I reviewed the most recent Safety Clean waste disposal manifest, and the SDS records on site but did not obtain copies. The disposal manifest and SDS records indicated that no HAPS were contained in the primer, paint, or clear coat. The filter efficiency certificate can be found in Appendix 6. I reviewed the paint usage and paint booth specification documentation on site but did not obtain copies. I also asked Mr. Jason Fluegge about Affordable's methylene chloride usage records. Mr. Jason Fluegge informed me that the facility does not use any methylene chloride or any paint stripping materials.

At the conclusion of the inspection, I conducted an exit interview with Mr. Jason Fluegge. I explained my initial observations. Mr. Jason Fluegge signed the Confidentiality Notice (Appendix 1) on February 16, 2022 (and submitted it via email on February 18, 2022), and a Receipt for

Documents and Samples (Appendix 2) on January 25, 2022. No claim of confidentiality was made.

I conducted a closing meeting and left the facility at about noon.

AREA/DOCUMENTS INSPECTED/REVIEWED

I reviewed the condition of the paint booth, the operating status, and any required record keeping for the equipment.

Subpart HHHHHH requires facilities to maintain records for the painter training certification, paint gun specifications, and filter material specifications. Mr. Jason Fluegge provided records of the paint gun certification during the inspection. Mr. Jason Fluegge provided the painter training certifications following the inspection on February 3, 2022 (Appendix 5). Mr. Jason Fluegge provided the filter efficiency document following the inspection (Appendix 6) via electronic mail on January 29, 2022.

Observations are noted in the **Investigation Observation** section below.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Site conditions and activities are documented in the inspection checklist (Appendix 3). The field photographs are included as Appendix 4. I made the following observations and discussed all observations with Mr. Jason Fluegge during the closeout meeting. These observations are not final compliance determinations. EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

I noticed a slight paint smell upon entering the facility. I did not observe opacity or fumes from the paint booth. Mr. Jason Fluegge told me that he never notices or smells emissions from the Affordable facility. I did not notice any painting outside of the paint booth.

I observed and Mr. Jason Fluegge reported to me that the paint booth filter had been installed and was functional.

I observed a coating of collected emissions particulate on the paint booth filter material (Photograph 8, Appendix 4).

No emissions were observed exiting the roof of the paint booth.

I observed that Affordable had two paint guns in use. 40 CFR Part 63, Subpart HHHHHH requires paint gun certifications and Affordable is required to maintain a copy of the certifications. Mr. Jason Fluegge said that the paint guns were manufactured by Tekna. Mr. Jason Fluegge provided copies of the paint gun certifications (Appendix 5). The two paint guns were both manufactured and labeled as Tekna. Both paint guns were certified as high volume-low pressure (HVLP). Both paint guns appeared to meet the Subpart HHHHHH requirements.

Potential Finding 1: Paint booth pressure gauge
Observation Summary: The paint booth did not have a pressure gauge
Citation: 40 CFR, Part 63, Subpart HHHHHH (63.11173 (e)(2)(ii))
Evidence: Appendix 4 Photographs and Photographs Log- Photos 7 and 9

Potential Finding 1: Paint booth pressure gauge
Description of Observation: During the facility tour, I observed the paint booth did not have an installed and operating pressure gauge. Mr. Jason Fluegge said that he purchased a pressure gauge and would install it promptly. Mr. Jason Fluegge showed me the new pressure gauge that was still in the box.

Potential Finding 2: Painter Training Certification
Observation Summary: There was no record of Jason and Tyler Fluegge having taken the required training.
Citation: 40 CFR, Part 63, Subpart HHHHHH (63.11173 (e)(1))
Evidence: Appendix 5 - Paint Gun Specifications, Jason Fluegge and Tyler Fluegge Training Certifications.pdf - Pages 2 and 3
Description of Observation: Painters are required to take training every 5 years and maintain 5 years of records. At the time of the inspection, no individual had documentation of completing the required training. Mr. Jason Fluegge told me that the only Jeff Erhart would be required to take the training. No training certificate was provided for Jeff Erhart. Following the inspection, on January 29, 2022, Mr. Jason Fluegge provided training certifications, via electronic mail, for himself and Tyler Fluegge but did not include a certification for Jeff Erhart. Jason Fluegge and Tyler Fluegge's certificates were dated after the inspection. However, Mr. Jason Fluegge did not say that he or Tyler Fluegge painted the vehicles during the inspection.

Potential Finding 3: Notification of compliance status and annual notification of change report
Observation Summary: The facility did not produce a notification of compliance status or annual notification of change report.
Citation: 40 CFR, Part 63, Subpart HHHHHH (63.11175 (b) and 63.11176 (a))
Evidence: <i>No Notification of Compliance Status or Change Report were reports or provided</i>
Description of Observation: Affordable is required to submit a copy of the Notification of Compliance status and an annual Notification of Change Report. Affordable did not produce any notifications.